

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOHN NG,

Plaintiff,

--against--

X

Docket #: 08 CV 2045 (DLC)

PLAINTIFF'S INITIAL  
DISCLOSURES

THE CITY OF NEW YORK, NEW YORK  
CITY HEALTH AND HOSPITALS  
CORPORATION, HARLEM HOSPITAL  
CENTER AND DETECTIVE ALEXANDER  
BROWN, SHIELD # 3009, IN HIS  
INDIVIDUAL CAPACITY AND AS A  
POLICE OFFICER FOR THE NEW YORK  
CITY HEALTH AND HOSPITAL  
CORPORATION,

Defendants.

X

Plaintiff, by his attorneys, Law Office of Pat Bonanno & Associates, P.C., by Thomas M. Gambino, Esq., as and for his initial disclosures pursuant to Rule 26(a)(1), provide as follows:

A. Witnesses

John Ng, 620 West 239 Street, Bronx, NY 10463.

Dr. Jasmine Pottinger, 210 East 118<sup>th</sup> Street, Apt. 201, New York, NY 10035.

The above witnesses will testify as to factual allegations contained in Plaintiff's Complaint.

B. Documents

Plaintiff is not presently in possession of any documents.

C. Damages

Damages are calculated as follows:

Without the assistance of an actuary, Plaintiff can only estimate his damages. Damages are based upon his loss of career development, loss of reputation and standing in the community and Constitutional violations and tortious misconduct, plus punitive damages and attorney fees.

D. Insurance

None.

Plaintiff reserves the right to amend these responses as may be necessary and appropriate.

Dated: Poughkeepsie, New York  
August 7, 2008

Respectfully submitted  
Law Office of Pat Bonanno & Associates, P.C.  
222 Church Street  
Poughkeepsie, NY 12601  
(845) 473-0427

By: \_\_\_\_\_/s Thomas M. Gambino \_\_\_\_\_  
THOMAS M. GAMBINO, Esq. (TG6332)  
Of Counsel

**AFFIRMATION OF SERVICE BY MAIL**

I, Thomas M. Gambino, an attorney duly admitted to practice before the courts of this State, affirms under penalty of perjury that, on August 7, 2008, I served a copy of the within Initial Disclosures by depositing the same, enclosed in a first class postage paid properly addressed wrapper in an official depository under the exclusive care of the United States Postal Service within New York State, addressed to each of the following persons at the last known address set forth after each name:

Corporation Counsel of the City of New York  
Attn: Johana V. Castro, Esq.  
100 Church Street  
New York, NY 10007

Dated: Poughkeepsie, New York  
August 7, 2008

\_\_\_\_\_*/s Thomas M. Gambino*\_\_\_\_\_  
THOMAS M. GAMBINO, Esq.(TG6332)